REMARKS

Claims 1-3, 5-15, 20, and 21 are currently pending in the present application. Support for the amendments may be found throughout the specification, such as paragraphs [0031] and [0042], for example. No new matter has been added by way of the amendments.

Interview Summary

Applicant's representatives, Mr. Kenneth Eiferman and Mr. Bentley Olive, and Examiner Brent Stace participated in a telephonic interview on November 12, 2010, to discuss the claim amendments and remarks herein. The Examiner agreed to reevaluate the rejections in view of the amendments and remarks herein.

Claim Objections

Claims 1 and 21 stand objected to because further clarity is suggested regarding what is input into the "deterministic data generation module." It is suggested to amend claim 1 to recite "accepting, as a first input to a deterministic data generation module, at least one of... ." Claim 1 has been amended as suggested. Claim 21 recites at least one computer processor. Such a computer processor may, for example, implement the functions of a deterministic data generation module. For at least this reason, it is believed that the recitation of a deterministic data generation module is not needed in claim 21.

The Office Action also contends that the generated first and second synthetic data does not appear to be an output. Claims 1 and 21 have been amended to make clear that the synthetic data is output by the deterministic data generation module.

Accordingly, for at least the aforementioned reasons, it is respectfully submitted that the objections to the claims should be withdrawn.

Claim Rejections – 35 U.S.C. § 112

Claims 1-3, 5-10, and 21 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Office Action contends that the claims contain subject matter which was not sufficiently described in the specification.

It is assumed that the Office Action refers to the portion of the claims added by the previous Office Action Response dated June 1, 2010 as not being sufficiently described in the specification. Support for these claims amendments are believed to be provided in the specification for at least the reasons that follow.

Regarding the claim feature of "generating first synthetic data and determining a position of an item in the first synthetic data," generation of first synthetic data is described, for example, at paragraphs [0031] - [0035]. Particularly, this portion of the specification describes a generator function for generating such synthetic data. As described in paragraphs [0034] – [0036], for example, a seed value can be used for determining a number. The initial seed is applied to the random number function for outputting a value (*See, e.g.,* ¶ [0037]).

Further, as provided in the example of paragraphs [0036] and [0037] and described throughout the present application, the first seed is used as input to a deterministic data generation module for regenerating at least the item of data at a first numerical position in the sequence of the first synthetic data. The first seed is within a first range allowed by a parameter of the data generation module. The parameter and the first seed are configured to cause the data generation module to generation the first synthetic data. The data generation module outputs a first random number using the first seed.

Claim 1 also recites determining a second seed as a third input to the data generation module and corresponding to a second numerical position in a sequence of second synthetic data. The second seed is within a second range allowed by a parameter of the data generation module. ***The second range is different than the first range.*** The parameter and the second seed are configured to cause the data generation module to generate the second synthetic data. ***The first and second synthetic data are different.*** An example of this feature is provided in paragraph [0042], where it is described that another seed value is set by advancing the random number generator sequence by a certain number of steps from a selected seed. For example, for a selected seed of z, the generator can be advanced by 100 increments per customer or z_{100n} (*See, e.g.,* ¶ [0042]). In this case, the seed for customer 1 would be a z_{100} and for customer 99 would be z_{9900} (*See id.*). This can be advantageous, for example, because differing synthetic data from

the same data sets may be generated for different customers. The different synthetic data can be generated because different parameters and seeds are used for generating the data.

For at least the aforementioned reasons, it is respectfully submitted that the rejection of claims 1-3, 5-10, and 21 under 35 U.SC. § 112, first paragraph, should be withdrawn.

Claims 9 and 10 stand rejected under 35 U.SC. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claimed subject matter. Particularly, the Office Action states that claims 9 and 10 recite "the synthetic data" when claim 1 recites first and second synthetic data. Claims 9 and 10 have each been amended to replace "the synthetic data" with "first and second synthetic data." The claims should now be clear. Accordingly, for at least this reason, it is respectfully submitted that the rejection of claims 9 and 10 under 35 U.SC. § 112, second paragraph, should be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 11-15 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Duckworth in view of "Quickly Generating Billion-Record Synthetic Databases" by Gray et al. ("Gray"). Without conceding the merits of the rejection, claims 11 and 20 have been amended to further clarify the claimed subject matter.

Claim 11 has been amended to recite, in part, that each of the seeds act to position the deterministic data generation module ***at different positions*** to regenerate data having a predefined sequence number. By doing so, the module generates different sets of synthetic data as discussed above in detail. Further, claim 11 has been amended to recite that each of the seeds act to position the deterministic data generation module at different positions such that different data is regenerated and has a different, predefined sequence number.

Duckworth does not disclose generating different synthetic data from the same data by use of different parameters and seeds as recited by claim 11. Duckworth teaches using a seed. However, Duckworth teaches using the seed to indicate a starting point of a random sequence of data. Duckworth teaches that the seed may be replaced with another seed, but the synthetic data generated by using the seeds will be the same. The differing seeds merely provide a different

starting point for the sequence. For at least these reasons, Applicants respectfully submit that Duckworth does not disclose or suggest each and every feature recited by amended claim 11.

Gray is directed to the generation of random numbers; however, Gray does not disclose or suggest the claim 1 features of generating different synthetic data from the same data by use of different parameters and seeds. Further, Gray does not teach each seed acting to position a deterministic data generation module at different positions such that different data is regenerated and has a different, predefined sequence number. Accordingly, Applicants respectfully submit that Duckworth and Gray, either alone or in combination do not disclose or suggest these features.

Claim 20 has been amended similar to claim 11, and therefore is distinguished from Duckworth and Gray for similar reasons.

For at least the foregoing reasons, Applicants respectfully submit that Duckworth and Gray, either alone or in combination, do not disclose or suggest the aforementioned features of claims 11 and 20. Accordingly, Applicants respectfully submit that the rejection of claims 11 and 20 under 35 U.S.C. § 103(a) should be withdrawn.

CONCLUSION

By the remarks and the amendments provided herein, the Applicant respectfully submits that the Office Action mailed August 24, 2010 has been traversed and that the application is in condition for allowance. If the Examiner has any concerns regarding the response provided herein, or wishes to discuss the response further, the Examiner is invited to contact the undersigned attorney.

The Commissioner is hereby authorized to charge any deficiency or credit any overpayment of the fees associated with this communication to Deposit Account No. 23-3050.

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/Kenneth R. Eiferman/
Kenneth R. Eiferman
Registration No. 51,647

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439